

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 24-CR-10293-AK
)	
CLS GLOBAL FZC LLC,)	
Defendant.)	

UNITED STATES' MOTION FOR FINAL ORDER OF FORFEITURE

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, respectfully moves this Court for the issuance of a Final Order of Forfeiture in the above-captioned case pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), and Rule 32.2(c) of the Federal Rules of Criminal Procedure. A proposed Final Order of Forfeiture is submitted herewith. In support thereof, the United States sets forth the following:

1. On April 2, 2025, this Court issued a Preliminary Order of Forfeiture against the following property, in connection with the charges against the defendant CLS Global FZC LLC, (the "Defendant"), pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), and Rule 32.2(b)(2) of the Federal Rules of Criminal Procedure:

(a) All funds, including cryptocurrency, and anything else of value located in the account with User ID 42132227 (including sub-accounts with User IDs 864465559 and 938873655) on the Binance cryptocurrency exchange; and

(b) All funds, including cryptocurrency, and anything else of value located in the accounts with User IDs 201938192, 66415195, and 133956595 on the KuCoin cryptocurrency exchange;

(collectively, the "Properties"). See Docket No. 29.

2. Notice of the Preliminary Order of Forfeiture was sent to all interested parties and published on the government website www.forfeiture.gov for thirty (30) consecutive calendar days, beginning on April 4, 2025 and ending on May 3, 2025. See Docket Nos. 34 and 35.

3. No claims of interest in the Properties have been filed with the Court or served on the United States Attorney's Office, and the time within which to do so has expired.

WHEREFORE, the United States requests that this Court enter a Final Order of Forfeiture against the Properties in the form submitted herewith.

Respectfully submitted,

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